

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

STATE OF NEW JERSEY,

Plaintiff,

v.

UNITED STATES DEPARTMENT OF  
TRANSPORTATION, FEDERAL HIGHWAY  
ADMINISTRATION, KRISTEN WHITE, in her official  
capacity as Acting Administrator of the Federal Highway  
Administration, and RICHARD J. MARQUIS, in his official  
capacity as Division Administrator of the New York Division  
of the Federal Highway Administration,

Defendants,

and

METROPOLITAN TRANSPORTATION AUTHORITY and  
TRIBOROUGH BRIDGE AND TUNNEL AUTHORITY,

Defendant-Intervenors.

Civil Case No. 2:23-cv-03885

**Oral argument requested**

**Motion Day: March 3, 2025**

**NOTICE OF MOTION FOR LEAVE TO  
SUPPLEMENT THE COMPLAINT**

**PLEASE TAKE NOTICE** that, upon the accompanying Memorandum of Law and proposed Supplemental Complaint annexed thereto, and all prior pleadings, papers, and proceedings in this action, Plaintiff State of New Jersey (“New Jersey”), by and through its counsel, King & Spalding LLP, will move this Court before the Honorable Leo M. Gordon, on March 3, 2025 or on such date as the Court orders, for an Order pursuant to Rule 15(d) of the Federal Rules of Civil Procedure granting New Jersey leave to serve and file its Supplemental Complaint.

**PLEASE TAKE FURTHER NOTICE** that in accordance with Local Rule 7.1(e), a [Proposed] Order Granting New Jersey's Motion for Leave to Supplement the Complaint is attached hereto.

**PLEASE TAKE FURTHER NOTICE** that oral argument is requested.

Dated: New York, New York  
January 27, 2025

By: /s/ Randy M. Mastro

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